

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

UNITED STATES OF AMERICA

v.

MUNISH SOOD

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18 CR 620

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**SENTENCING MEMORANDUM  
ON BEHALF OF MUNISH SOOD**

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Richard J. Zack

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*Attorneys for Defendant*  
Munish Sood

**I. PRELIMINARY STATEMENT**

Munish Sood is a decent and caring person, who erred gravely in participating in a conspiracy to commit bribery. Mr. Sood takes full responsibility for his criminal conduct and stands ready to face the consequences. He has already paid a significant price for his misconduct. His criminal conduct is an exception to the otherwise enviable example he has set for his family and colleagues. He has made countless contributions to his community, in big and small ways, and has had a positive impact on many lives. His crime is a glaring exception to a life well-lived.

Mr. Sood completely accepts that he committed serious crimes and deeply regrets his conduct. Immediately after his arrest, Mr. Sood cooperated with the government. He met with the government dozens of times and provided key testimony to secure convictions against others who were more culpable and who fought the government at every opportunity. Mr. Sood testified for several days at two highly publicized federal trials, under intense cross-examination and the glare of public scrutiny. Mr. Sood has also admitted his wrongdoing to everyone he knows, including explaining to his children, parents, extended family and friends, and clients what he did wrong and the fact that he must now accept the consequences of his wrongdoing, which include being branded a convicted felon for the rest of his life.

Through Mr. Sood's hard work and determination he has accomplished a great deal in his life. He came to the United States from India when he was just six years old, built a successful business, gained the respect and admiration from his employees and clients over the years, and has cared for his elderly parents who suffer from severe health issues.

Mr. Sood now asks this Court to view his participation in this conspiracy against the backdrop of his life of hard work, kindness, and devotion to his friends and family. Mr. Sood has never committed a crime before participating in this conspiracy and will never commit

another crime. Mr. Sood anticipates that the government will be apprising the Court of his cooperation and its value, and seeking a downward departure. Mr. Sood submits that his extensive and valuable cooperation with the government coupled with his record of hard work, kindness, and devotion warrant a sentence of probation.

## **II. MR. SOOD'S PERSONAL BACKGROUND**

Munish Sood was born on August 4, 1972 in Moga, a small city in Northern India. Both of his parents were born and raised in India and immigrated with Munish Sood and his younger brother Ashish Sood when Munish was six years old. Munish's parents came to America so that Munish and his brother could have better opportunities in life.

When Munish arrived in America, his family lived in Queens, New York, close to some of his relatives, before his parents settled in Robbinsville, New Jersey, where he was raised and still lives today. In 1990, Munish Sood graduated from Allentown High School in New Jersey. Munish wanted to stay close to home for college and attended Rider University in Lawrenceville, New Jersey, where he graduated with a Bachelor of Science in 1994 in Finance & Accounting.

Munish Sood learned from his family the importance of hard work that he would continue to value throughout his life. His family embraced the American dream with his parents working long hours to assure that Mr. Sood and his brother were able to receive a great education. Munish's father worked for nearly 35 years in a cosmetology factory working long hours in Long Island City. His father would commute two hours to work from Robbinsville to Long Island City so that Munish and his brother would have opportunities that were unavailable to him. Munish's mother also worked throughout his childhood in a retail store.

In 1997, Munish Sood married Anita Thatte, his college sweetheart. They have supported each other completely through their 22 year marriage. Mr. Sood's wife has worked as

a CPA and together they are in the process of raising three children. Their oldest daughter is a junior in high school and they look forward to her attending college next year. Their middle child is 14 years old and will begin high school next year. Finally, their youngest is 11 years old. All three of their children have benefited immensely from Munish's love and support.

Mr. Sood always had an interest in finance and began to pursue his career after his graduated from Rider. Mr. Sood's successes did not come right away and he had to work hard to gain the trust of his clients and adjust to the always evolving business sector. Mr. Sood started his career as a Senior Analyst and Trader at Penn Capital Management, Inc. He then became an associate at Bankers Trust and focused on fixed income arbitrage. In 1999, he became a Senior Portfolio Manager at Global Value Investors, Inc. Not content to work for others, Mr. Sood wanted to build a business of his own. Two years later, Munish Sood co-founded BoTree Investments, LLC, where he was the Chief Investment Officer. Munish was responsible for managing and investing in structured products and overseeing all investment activity in Botree Asset Management, LLC.

In 2002, Munish Sood founded Princeton Advisory Group, Inc. (PAG) and served as its Chief Investment Officer. PAG provided investment management services to institutional clients. Munish Sood also founded Princeton Advisory Wealth Management (PAWM), which managed high net worth investments from clients. In 2016, Munish Sood was asked to take over the management of Princeton Capital Corporation which was a publicly traded business development company and served as the President and Director. Munish Sood is also one of the founders of First Choice Bank in Lawrenceville, New Jersey, and served as the Chairman of the Board from 2007 until the bank was sold in 2016.

### III. **MR. SOOD'S CHARACTER**

Mr. Sood is universally admired by his friends and family as being a devoted family man, a loyal friend who is willing to step up in a time of crisis, and someone who conducts his business fairly and with integrity. Munish's friend, Dr. Chetan Shah, described Munish as "Dull and boring – no smoking, no drugs, never intoxicated, drama free, practical, reliable, always the rational person in the group, caring for others before oneself." (Dr. Chetan Shah letter, Ex. 19).<sup>1</sup> Although he has worked hard building his businesses, Mr. Sood's first priority has always been providing and caring for his loved ones.

#### A. **Munish Sood's Family**

It is hard to overestimate how important family is to Munish Sood. All of the attached character letters attest to his devotion to his family. Mr. Sood's idea of family is not just limited to his immediate but extends to his friends, his employees, and neighbors.

Munish is devoted to his wife and children. Munish's friend, Sailing Adler explained:

Whenever I would speak to Munish, he would always speak about his wife and family and how working hard every day was for them. He truly loves his wife and kids and is a terrific father.

(Sailing Adler letter, Ex. 1). Munish's friend, Akin Ayodele provided some additional insight regarding the importance of family for Munish:

I've witness[ed] Munish place his family above profits, above business matters or potential clients. On several occasions, Munish has left an important client meeting to jump on a redeye flight back home, just in time to land and take his young kids to school or leaving earlier because he felt he had missed to[o] much time away from his lovely wife Anita. In the world I currently and previously serve, its unprecedented.

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<sup>1</sup> The character letters submitted on Munish Sood's behalf have been included with this sentencing memo as Exhibits. The character letters are organized alphabetically.

(Akin Ayodele letter, Ex. 3). Munish's friend John Frontero shared a similar experience: "[i]t was not unusual for Mr. Sood to stay in contact with his family when out late for work events, doing his best to balance his work and family commitments." (John Frontero letter, Ex. 7). His friend, Vinay Navani, described Munish as having an "unspoken devotion" to his wife and that he "relies on her sense of balance and calmness to offset his more outgoing personality and help[s] keep him grounded." (Vinay Navani letter, Ex. 13).

Regarding Munish's parents, Vinay Navani shared that Munish "feels indebted to the sacrifices they have made coming to this country from India and giving him opportunities which he would have otherwise not had." (Vinay Navani letter, Ex. 13). Munish does not only care for his parents, but they live with Munish. When Munish "built his family home in Robbinsville, New Jersey, he included a major portion of the home for his elderly parents who continue to live with Munish, Anita and the children today." (Francis John letter, Ex. 8).

Munish's cousin, Sapna Thakur shared the following about Munish's care for his family:

Words cannot explain what he has done for his parents. Munish is an example of what every son should be for their parents. He currently has taken his parents in his home to give them the care and love that is needed during their golden years of life. As his father suffers from Parkinson's Disease, Munish recognized the importance of having his parents live with them and give them aid that is essential on a daily basis. He built a home to accommodate his parents' needs so they can live comfortably without the difficulties of moving up and down the stairs. He supports his parents both emotionally and financially. He moved them to his house over 5 years ago. As elderly parents they lean on their son for love and care. Munish has provided them with all the comforts that are needed.

(Sapna Thakur letter, Ex. 22). Putting his parents in a nursing home was not an option for Munish. Munish wanted to make sure that his parents' last years were spent comfortably in Munish's home with their grandchildren they could see on a daily basis.

Munish Sood has also helped guide his younger brother's career. For the past 14 years, Munish has included his younger brother in his business and provided him an opportunity to build and grow his business skills. Munish's tax advisor and friend, Vinay Navani, explained:

Munish has also given [] support to his brother, Ashish Sood, for over a decade by bringing him into business and allowing him to grow professionally by starting a new segment of their financial services business. Even as the business segment has not performed well, Munish is committed to helping his brother succeed.

(Vinay Navani letter, Ex. 13).

**B. Munish Sood Has Cultivated Good Will in His Business Relations and in His Employees**

Even in his business relations, Mr. Sood has cultivated good will and friendship amongst his business partners and employees. Many people who have submitted character letters on Munish's behalf have described how Munish has stepped up to help them out in tough times or how Munish as an employer has put their interests over profits, encouraging them to spend more time with their family. For instance, Dr. Rakesh Patel, one of Munish's business partners shared the following example:

At this time in my life, I was attempting to restructure my current practice with my fellow partners. However, one of my partners suddenly decided to change some of the legal language in an attempt to weaken my position in the firm. Because I am unfamiliar with the nuances of the business side of a company. I felt both powerless and frustrated. It seemed like everything I had worked for was about to go to waste. It was at this time Munish came to my aid. As soon as he heard about the what was going on, he immediately came to my house and calmed me down. He gave a reassuring presence and made me feel like everything would be alright. Right after he left, he got right to to work at creating a compromise that secured my position.

(Dr. Rakesh Patel letter, Ex. 16).

Mr. Sood is someone his friends call if they were facing challenges. For instance, Munish Sood's friend, Sailing Adler wrote:

Whenever I would have challenges and felt marginalized by my industry, the financial services industry, I would call Munish and he would always make me feel better.

(Sailing Adler, Ex. 1).

As mentioned in nearly every character letter, family is paramount to Mr. Sood.

He is also supportive of his employees when family issues come up. Kathy Collins who worked for Mr. Sood had this to share:

I had just begun my employment with his firm and had been working for two (2) weeks when my mother suffered a massive stroke and was diagnosed as terminal. My family had made arrangements for her to return home on hospice care. I met with Munish to explain my situation and said that I felt it was unfair to him and the firm and would like to tender my resignation as I was not sure how long I would be unavailable. Without hesitation, he got up from behind his desk and sat in the chair next to me and stated "Family is the most important thing to me and I am not accepting your resignation. Your job will be here for you. Go home; be with your mother and your family during this very stressful time. I am also here if you need anything." Even though he was not obligated, he made sure my payroll was processed so that I had no financial worries during this period.

(Kathy Collins letter, Ex. 6). Similarly, Munish also showed kindness to his longtime employee, Joy Sheehan, when she needed to step away from her important role at PAG to spend more time with her family:

Another example of his commitment to family was when he allowed me to take as much time as I needed when my father was dying of cancer followed by the sudden loss of my 22 year old nephew, and the continued care of my mother who suffers from many conditions including Alzheimer's, time I will be eternally grateful for.

(Joy Sheehan letter, Ex. 21).

Francis John, who was known and worked with Munish for nearly 20 years as a board member, investor and mentor has a similar view of Munish:



Over the 20 years I have known Munish, he has demonstrated tremendous value in developing employees, showing concern for the employees families as well as the individuals professional success. Munish is clearly an outstanding team player believing [more] in the greater good than being motivated by what's in it for him.

(Francis John letter, Ex. 8).

Many people in Munish's industry have attested to his integrity and Munish's willingness to do the right thing despite losing business. His hard-earned reputation for kindness, honesty, and generosity has been tarnished by his criminal conduct. This has caused him great anxiety and he knows he has to rebuild his reputation. Mr. Sood has adopted an approach of accepting responsibility for his crimes and working to earn back the trust of his family, friends, and colleagues. Despite this case, Mr. Sood's business partners have not abandoned him and have stood by him. Munish's business colleague, Phil McConkey shared the following stories regarding Munish:

As an example, around March of 2011, we were in a meeting with a prospect who had suggested that we jointly pursue an opportunity that would potentially involve operating in a grey area under FINRA rules. Despite the fact that we would have gained a substantial commission if we were involved in the deal, Munish turned down the offer and never engaged that person again.

About a year later we were recruiting a FINRA register[ed] representative who was generating considerable amount of revenue every year but had a couple violations on his record. Once discovered, Munish stopped pursuing this individual and said, "no money is worth jeopardizing our reputation by associating with someone like that."

(Phil McConkey letter, Ex. 11).

**C. Munish Sood Is a Leader in His Community and Works Hard to Give Back**

Munish Sood deeply cares about his community and works hard to give back and support individuals and organizations that need help. Munish was on the organizing board of community bank. As someone who worked closely on the board with Munish explained:

Munish's contributions in the monthly organizer meetings were precise and well thought out. His attendance was impeccable. Munish believed in the mission and concept of the creation of a Community Bank focusing on all ethnic backgrounds and superior customer relationships, through a dedicated and viable staff and board of directors. Munish was voted in as Chairman of the Board.

(Herbert Ames letter, Ex. 2).

As Munish's friend Herbert Ames said "Munish still has a lot of good to do in our society." (Herbert Ames letter, Ex. 2). Munish's friend Jeannine Cimino wrote that Munish "was always there to lend a helping hand whether it be at Habitat for Humanity or through his generous and philanthropic support at the many events and organizations that he has and continues to support in the community." (Jeannine Cimino letter, Ex. 5).

Munish Sood has inspired many and served as mentors to many people. Former NFL player, Akin Ayodele shared the following experience about how interactions with Munish helped inspire him to make a huge career change:

Our conversations often led to thought provoking questions for me to think [about] regarding my next move or future decisions. It forced me to think beyond football and [the] bubble I was living in. As a[n] NFL starter for 9 years, I never missed a game, so it was surprising for most when I decided to retire from football and pursue another journey. But because of those conversations with Munish I had, I felt confident enough to leave behind something that had shaped and given me so much. Because of the types of conversations Munish and I had, I was certain enrolling into graduate school would be a benefit to my next career. While I was enrolled in grad school and taking classes, Munish was available to answer questions and continue to give me motivation during the long dog days of school work.

(Akin Ayodele letter, Ex. 3). Munish has also been an inspiration to others starting their careers on a similar path, such as Jamar Redmond, who wrote “As a young man rising in this world, I definitely view Munish as a big brother figure in which I intend to continue to follow the paths that he has laid out in front of me for the betterment of myself and those dearest to me.” (Jamar Redmond letter, Ex. 18). Munish has a strong desire to help individuals who, like him, do not possess the typical background to break into finance.

Munish Sood also teaches his children the importance of giving back. Munish’s friend, Kenneth King, recalled that “Munish, on several occasions, telling me and other colleagues about discussions with his children regarding how important it is to give back to your community and to be a dedicated and caring member of society.” (Kenneth King letter, Ex. 9).

Munish’s friend Norman Koenisberg shared the following regarding Munish’s desire to give back to his community:

He is family man, with strong ties to his community. Munish[] is an honest man who would give anyone he meets the “shirt off his back.” He is a man of faith, frequently offering to help those less fortunate get back on their feet.

(Norman Koenisberg letter, Ex. 10). Munish has also offered a young entrepreneur free office space for months so that he could setup his business. (Sripat Pandey letter, Ex. 15).

Munish also gives back in several ways to causes back in his birth country. Munish sponsors twenty-two girls in India; committing to pay for their education from elementary school to high school. Munish has also paid for several weddings for family friends back in India.

These are only some of the many ways that Munish has strove to give back to his community.

**D. Munish Sood Developed a Reputation of Honesty in Business**

Munish sets high ethical standards for himself in his business dealings and is typically more focused on upholding those standards than his contemporaries. He is regretful and disappointed in himself for engaging in the criminal conduct he pleaded guilty and recognizes the damage it has done to his reputation. He knows he has only himself to blame. Munish's friend Sailing Adler explained:

There are times that the firms I am working for sell products that I feel are questionable and that they do not really care about the clients, but their own bottom line. Munish always tells me as long as you put the client first, good things will happen! I have taken that to heart and I know he truly feels that way!

(Sailing Adler letter, Ex. 1). Jeffrey Bacon, who Munish has worked with for about eight years as an investment broker believes that "Mr. Sood has always put his client's interest first" and has "kept keen attention to whatever costs I would charge for services, making sure his clients were well served." (Jeffrey Bacon letter, Ex. 4).

Munish Sood has always made sure that he was complying with regulations. Joy Sheehan his Chief Information Officer wrote:

Munish gave me full authority to act as chief compliance office giving me the ability to instill a culture of compliance, nurture an environment where employees understand the value of honesty and integrity, and encourage everyone to take compliance issues seriously. [...] I also wanted to note that the advisory firms went through formal and information SEC examinations over the years and no significant findings related to [Munish's] firms were reported.

(Joy Sheehan letter, Ex. 21).

**IV. MR. SOOD PROVIDED EXTENSIVE COOPERATION TO THE GOVERNMENT**

On August 20, 2018, Munish Sood entered into a cooperation agreement with the Government. He knew that the only way to rebuild his life was to assist the government in

securing the convictions of others. He knew that righting his wrongs and acceptance of responsibility for his actions was the best path. Mr. Sood took the cooperation agreement seriously and provided important documents to the government and met with the government dozens of times to assist in the investigation. Later, he was a key witness against the ringleaders of the conspiracy, *United States v. Gatto*, Case No. 17-CR-684, and spent countless hours with government attorneys preparing for trial. He was a key witness in both trials providing an inside view of the conspiracy. Mr. Sood was the first substantive witness the government called in the *Gatto* trial. Munish's testimony helped the jury understand the conspiracy and decide to convict the more culpable ringleaders. Additionally, Munish promptly responded to requests for documents and information. Munish Sood has clearly provided "substantial assistance" to the government as is defined by Section 5K1.1.

**V. MR. SOOD IS REMORSEFUL FOR HIS ACTIONS**

Not only is Munish Sood very remorseful for his crimes, but he has likewise accepted full responsibility for his wrongful conduct and taken definitive steps towards remediation. Almost immediately after his arrest, Mr. Sood informed the government he wished to cooperate. His lawyers spoke with the government within hours of his arrest to make arrangements for Mr. Sood to begin his cooperation.

His agreement to cooperate is no surprise given Mr. Sood's history. He made the decision very early on to admit his misconduct and work to rebuilding his life. Shane Osborn, who served on Princeton Advisors board, said the following:

I have been a POW, fought in both Afghanistan and Iraq, involved in politics, started a successful business and I have made some major mistakes along the way, as we all have. I believe Munish owning up to his mistake shows his true character and I look forward to his continued friendship and advice now and in the future.

(Shane Osborn letter, Ex. 14).

Most difficult, though, was that accepting responsibility and cooperating meant that Munish had to come clean and confess everything to his beloved wife, Anita, and to his family and friends. Although that was not easy, Mr. Sood knew it was the right thing to do. He had to reveal the secrets that he had kept and own up to his crimes. The fear that he will not be around to take care of Anita, his children and his parents for any length of time because of what he has done has caused unending anguish for Mr. Sood, whose primary motivation has always been to make their lives better. The knowledge that he has caused them pain and anxiety when all he has ever wanted to do is provide for and protect them has been an acute punishment. But in the end, Munish has done what is right and what is honorable, and his family and friends have stuck by him, offering their support.

## **VI. THE LAW OF SENTENCING**

The government has advised Mr. Sood that it will move to depart downward from the applicable sentencing range. Accordingly, this Court possesses the authority to sentence Mr. Sood to a term of probation. This Court should sentence Mr. Sood to a term of probation based on the following factors: (i) Mr. Sood cooperated extensively, testifying at two trials and meeting with the government numerous times, (ii) Mr. Sood is less culpable than almost all of the other defendants, (iii) a sentence of probation would be consistent with the sentences received by the co-conspirators in this matter, and (iv) Mr. Sood's history as a productive law abiding citizen weighs in favor of probation. Each factor alone would warrant a significant downward departure or a sentence of probation, but taken together provide very strong support for a sentence of probation.

### **1. Mr. Sood Provided Substantial Cooperation to the Government**

As set out above, Mr. Sood has provided substantial cooperation to the government in their investigation. He has spent countless hours proffering to the government providing key details. He has produced relevant documents to the government including wire transfers of payments and contracts with players. Mr. Sood's honesty and credibility made Mr. Sood a key witness in two trials. As a witness, Mr. Sood provided testimony for multiple days that led to the conviction of the masterminds of the conspiracy. The government was grateful for Mr. Sood's help and agrees that Mr. Sood was cooperated. Thus, the government has advised that it will move for a downward departure.

Sentencing Mr. Sood to probation would send a message to would-be cooperators that their assistance will be considered.

**2. Mr. Sood is Less Culpable Than Almost All of the Other Co-Conspirators**

During the relevant time of the investigation, Mr. Sood was very new to the business of providing financial advice to professional athletes. As set out above, Mr. Sood's background had been in advising institutional clients. He became interested in advising athletes after meeting a few professional athletes and realizing that he could make a huge impact on their life. His relationship with former NFL player Akin Ayodele is a testament to his desire to mentor athletes who, like himself, who were not from backgrounds that would naturally lend to being financially literate. (Akin Ayodele letter, Ex. 3).

During the time of the investigation, Mr. Sood was learning the business from others who had more experience and frankly more resources to devote to luring young athletes to agree to be their client. Although Mr. Sood deeply regrets his inexcusable actions, he played a small role in a bigger scheme that involved multinational corporations, and people who were infinitely more connected to the sports industry.

For instance, James Gatto, a former Adidas marketing boss, and Merl Code, a former Adidas consultant, funneled tons of money through Code's consulting company using sham invoices. Mr. Sood was never the architect of the scheme, and instead followed instructions from others. For instance, when Gatto could not "push [the invoices] through the system" fast enough to appease parents looking for bribes, Mr. Sood agreed to front the money and was promised by Code that he would be reimbursed. Complaint at 16-17, *U.S. v. Gatto et al.*, 295 F. Supp. 3d 336 (S.D.N.Y. 2018) (No. 17-00686). Additionally, nearly all of Mr. Sood's payments were to sports agents, not parents of top athletes, in hope that the sports agents would refer clients to Mr. Sood. Furthermore, instead of sham invoices and consulting companies, Mr. Sood made his payments by check, thus not trying to hide the transaction compared to sham invoices and schemes other co-conspirators employed. As regrettable as his conduct was, Mr. Sood invested a limited funds in this venture, and never profited from his relatively small payments.

**3. Mr. Sood Receiving a Sentence of Probation Would Be Consistent with the Sentences of the Co-Conspirators**

Despite being more culpable than Mr. Sood, the ringleaders of the conspiracy and coaches who received bribes in exchange for steering players to agents, received low sentences. James Gatto, the ringleader of the conspiracy, received a nine month sentence, while Merl Code and Christian Dawkins, both heavily involved in all aspects of this scheme received six month sentences. Gatto, Code, and Dawkins did not cooperate and instead fought the charges and were ultimately convicted with the help of Mr. Sood. Former assistant coach Tony Bland was sentenced to probation after pleading guilty to receiving bribes. However, unlike Mr. Sood, Tony Bland did not cooperate with the government and did not provide testimony against the others.



The United States Sentencing Commission explains that one of its core missions is to provide “certainty and fairness in meeting the purposes of sentencing by avoiding unwarranted disparity among offenders with similar characteristics convicted of similar criminal conduct.” Sentencing Mr. Sood to probation would avoid unwarranted disparity among his co-conspirators.

4. **Mr. Sood Has a Strong History of Being a Productive Member of Society**

As set out above in detail, Munish Sood is a good man that is profoundly sorry for his transgressions. He has done a great deal of good that has changed countless lives for the better. He has learned from his mistakes, and has accepted full responsibility for his actions. He has no prior criminal history, and is extremely unlikely to recidivate in this manner again.

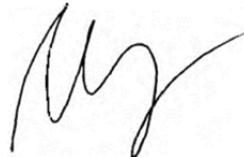
VII. **CONCLUSION**

At the time of Munish Sood’s sentencing, this Court will be charged with imposing a sentence that is fair, but “not greater than necessary.” 18 U.S.C. § 18553(a); Kimbrough v. United States, 552 U.S. 85, 101 (2007). This bedrock principle of sentencing law cannot be fulfilled in Munish’s case if he is sentenced at or near the range proposed by the Guidelines. Rather, a probationary sentence is more appropriate in this case.

Munish Sood plans to address the Court at his upcoming sentencing hearing to once again express his sincere remorse, and to assure the Court that he will never again break the law.

Dated: August 21, 2019

Respectfully Submitted,

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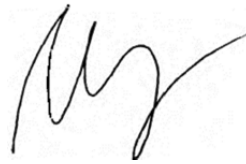
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**CERTIFICATE OF SERVICE**

I, Richard J. Zack, hereby certify that on August 21, 2019, a true and correct copy of the foregoing Sentencing Memorandum was served via ECF and email upon the following:

AUSA Noah Solowiejczyk, Esquire  
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A handwritten signature in black ink, appearing to be 'RJZ', is positioned above a horizontal line.

Richard J. Zack